

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Richmond Division

In re: Arlene Chandler
Debtor.

Case No. 15-31089-KLP
Chapter 7

Address: 3712 Austin Avenue
Richmond, VA 23222

Last four digits of Social Security No(s): 6106 }
Debtor(s) }

NOTICE OF MOTION

Arlene Chandler, the Debtor, has filed papers with the court to: **Motion to Re-Convert Chapter 7 to Chapter 13.**

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case.

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before **21 days after today's date**, you or your attorney must:

☐ File with the court, at the address shown below, a written request for a hearing or a written response. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

☒ Attend the hearing on the motion scheduled to be held on **May 29, 2019, at 10:00 am**, at the United States Bankruptcy Court, 701 East Broad Street, Room 5100, Richmond, Virginia.

**Clerk of Court
United States Bankruptcy Court
701 E. Broad Street, Room 4000
Richmond, VA 23219**

Joseph S. Massie, III, VSb No. 35472
Massie Law Firm, PC
115 N. 1st Street
Richmond, Virginia 23219
(804) 644-4878
(804) 644-4874 Fax

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You must also mail a copy to:

Joseph Massie, III
115 N. First Street
Richmond, VA 23219

Joseph S. Massie, III, VSb No. 35472
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CERTIFICATE OF SERVICE

I hereby certify that May 3, 2019 a true copy of the foregoing **Notice of Motion** was mailed or electronically transmitted to Peter J. Barrett, Kutak Rock, LLP, 901 East Byrd Street, Suite 1000, Richmond, VA 23219, Chapter 7 Trustee and Arlene Chandler, 3712 Austin Avenue, Richmond, VA 23222.

Date: May 3, 2019

/s/ Joseph S. Massie, III, Esq., VSB No. 35472
Joseph S. Massie, III

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MOTION TO CONVERT CASE FROM CHAPTER 7 TO CHAPTER 13

COMES NOW, Arlene Chandler, the Debtor, by counsel, moves the Court to convert this case to a case under Chapter 7 of the United States Bankruptcy Code back to a Chapter 13, and in support thereof states the following:

1. This Court has proper jurisdiction over the matters herein.
2. On March 3, 2015, the Debtor(s) filed a voluntary petition in bankruptcy Chapter 13.
3. Pursuant to 11 U.S.C. § 1112, the Debtor converted this case to one under Chapter 7 after giving proper notice and no objections were filed in response on January 18, 2019.
4. It is in the best interest of the Debtor and her creditors that her case is re-converted to a Chapter 13 case.
5. The Chapter 13 case upon re-conversion will be paid out at one hundred percent (100%).

WHEREFORE, the Debtor respectfully request that the Court enter an Order converting this case from a Chapter 7 back to a Chapter 13 of the U.S. Bankruptcy Code.

Date: May 3, 2019

By: /s/ Joseph S. Massie, III, Attorney for Debtor(s)
Joseph S. Massie, III

CERTIFICATE OF SERVICE

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The undersigned hereby certifies that on this date the foregoing **Motion to Re-Convert Case from Chapter 7 to Chapter 13** was served upon the standing trustee, all creditors, and all necessary parties electronically and/ or by mailing a copy to each party.

Date: May 3, 2019

/s/ Joseph S. Massie, III, Esq., VSB No. 35472

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| Allied Cash Advance 4380 S. Laburnum Avenue Henrico, VA 23231 | Allied Cash Advance 4380 S. Laburnum Avenue Henrico, VA 23231 | Allied Cash Advance 4380 S. Laburnum Avenue Henrico, VA 23231 |
| Bryant St. Bank 800 E. 60th Street N. Sioux Falls, SD 57104 | Bryant St. Bank 800 E. 60th Street N. Sioux Falls, SD 57104 | Bryant St. Bank 800 E. 60th Street N. Sioux Falls, SD 57104 |
| Capital One PO Box 71083 Charlotte, NC 28272-1083 | Capital One PO Box 71083 Charlotte, NC 28272-1083 | Capital One PO Box 71083 Charlotte, NC 28272-1083 |
| CarMax Auto Finance 225 Chastain Meadows Court Kennesaw, GA 30144 | CarMax Auto Finance 225 Chastain Meadows Court Kennesaw, GA 30144 | CarMax Auto Finance 225 Chastain Meadows Court Kennesaw, GA 30144 |
| Check into Cash 4738 Finlay Street Henrico, VA 23231 | Check into Cash 4738 Finlay Street Henrico, VA 23231 | Check into Cash 4738 Finlay Street Henrico, VA 23231 |
| Compucredit Corp/Salue P.O. O Bx 106666 Atlanta, GA 30346 | Compucredit Corp/Salue P.O. O Bx 106666 Atlanta, GA 30346 | Compucredit Corp/Salue P.O. O Bx 106666 Atlanta, GA 30346 |
| Office of the US Trustee 701 E. Broad Street Room 4304 Richmond, VA 23219-1885 | Altair OH XIII, LLC CO Weinstein, Pinson, and Riley, PS 2001 Western Avenue, Ste 400 Seattle, WA 98121-3132 | Cerastes, LLC c/o Weinstein and Riley, PS 2001 Western Avenue Ste 400 Seattle, WA 98121-3132 |
| CarMax Auto Finance 2040 Thalbro Street Richmond, VA 23230-3200 | Check into Cash 4738 Finlay Street Henrico, VA 23231-2754 | Continental Finance Company, LLC PO Box 8099 Newark, DE 19714-8099 |

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| DSNB/Macys PO Box 8218 Mason, OH 45040-8218 | First Premier Bank 301 S. Minnesota Ave Sioux Falls, SD 57104-6315 | Kristen Misleh, Esquire Atlantic Law Group, LLC PO Box 2548 Leesburg, VA 20177-7754 |
| Merrick Bank PO Box 5201 Old Bethpage, NY 11804 | PRA Receivable Management, LL PO Box 41067 Norfolk, VA 23541-1067 | (p) Portfolio Recovery Associates, LLC PO Box 41067 Norfolk, VA 23541-1067 |
| Premier Card PO Box 2208 Vacaville, CA 95696-8208 | TD Bank USA, NA c/o Weinstein & Riley, P.S. 2001 Western Avenue Ste 400 Seattle, WA 98121-3132 | VCU Health Sytem PO Box 758721 Baltimore, MD 21275-8721 |
| Arelene Chandler 3712 Austin Avenue Richmond, VA 23222-2404 | Premier Bank, Lllc C o Jefferson Capital Systems LLC PO Box 799 Saint Cloud, Mn 56302- 7999 | Sallie Mae on behalf of USDoE PO Box 740351 Atlanta, GA 30374-0351 |
| Target NB/TD Bank USA/ TargetCr PO Box 673 Minneapolis, MN 55440- 0673 | Virginia Department of Taxatio PO Box 2156 Richmond, VA 23218-2156 | Carl M. Bates PO Box 1819 Richmond, VA 23218-1819 |
| Premier Bankcard/Charter PO Box 2208 Vacaville, CA 95696-8208 | Seventh Avenue 1112 7 th Avenue Monroe, WI 53566-1364 | (p) Robert P McIntosh US Attorney S Office Eastern District of Virginia 919 E. Main St Suite 1900 Richmond, VA 23219-4625 |

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